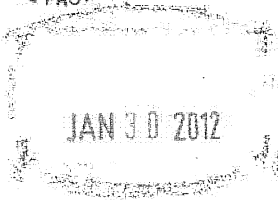




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590



REPLY TO THE ATTENTION OF:

Edwin C. Bakowski, P.E.
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

Dear Mr. Bakowski:

The U.S. Environmental Protection Agency has reviewed the draft Renewal Clean Air Act Permit Program permit (CAAPP permit) prepared by Illinois Environmental Protection Agency for The Peoples Gas Light and Coke Company (Application No. 95120163).

EPA has the following comments on the draft CAAPP permit:

1. EPA's indefinite stay of the effective dates of 76 FR 15608 (March 21, 2011) and 76 FR 15704 (March 21, 2011) – published at 76 FR 28662, May 18, 2011 – was vacated by the U.S. District Court for the District of Columbia Circuit on January 9, 2012.
<http://www.4cleanair.org/Documents/VacaturofBoilerStay010912.pdf>. Therefore, as of this date, 40 C.F.R. Part 63, Subpart DDDDD, May 20, 2011, is effective. Please update Condition 3.4 accordingly.
2. Throughout the permit, some conditions cite the legal authority for the condition (e.g., Conditions 5.3.2; 5.3.3; 5.3.6; 5.7; 5.8.a; 7.1.7; 7.2.3; 7.3.6; etc) yet other conditions do not (e.g., Conditions 5.9.2; 5.9.3; 5.9.4; 5.10.2; 7.1.5; 7.4.6.c; etc). Please provide the legal basis (rule or permit citation) for each applicable requirement.
3. For practical enforceability purposes, please clarify that "annual", as used in Conditions 5.3.7, 5.9.2, means "running 12 month total" or "12 consecutive months", as specified in Condition 7.3.6.
4. It is unclear what type of reporting is required by Condition 7.1.10.a.ii. Please re-write or clarify the condition.
5. 40 C.F.R. § 63.7515(e) establishes the frequency of the annual tune-ups required in Condition 7.3.5.a. Please add reference to 40 C.F.R. § 63.7515(e) in Conditions 7.2.5.a, 7.3.5.a.

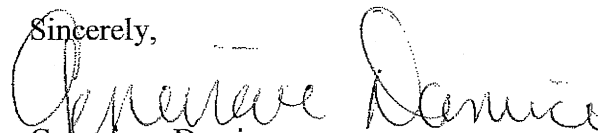
6. How is compliance with Condition 7.4.3.b. to be demonstrated?
7. Much of the text in Condition 7.4.9.e. is repeated in Condition 7.4.3.f. Since these requirements apply to the same emission unit, and address the same subject (malfunctions), please reconcile the two requirements so that one of the conditions can be deleted; or, alternatively, only record-keeping provisions should be provided in Condition 7.4.9.e. (Records for Malfunctions and Breakdowns).
8. Section 4 is cited in multiple areas in the permit, e.g., Conditions 7.4.9.e; 7.4.10.c.i, but it is not clear if this is the appropriate citation. Section 4 lists significant emission units and their construction dates while the above conditions pertain to recordkeeping/reporting of malfunction emissions. Please verify this reference.
9. According to Condition 7.4.12.a, compliance with Conditions 7.4.3(c) and (d) will be demonstrated by "proper operating conditions of the affected TEG dehydration units". Please clarify what is meant by "proper operating conditions of the affected TEG dehydration units" and how such a requirement is sufficient for demonstrating compliance with the mass-based emission limit in Condition 7.4.3(c).
10. Condition 7.4.12.b cites Condition 5.5. Please verify that this is the right citation.

Editorial Comments

11. In Condition 7.1.5, "pipeline quality gas" should be "pipeline quality natural gas"
12. Condition 7.3.8.c, last sentence should read: "If visible emissions continue, then measurements of opacity shall be made in accordance with EPA Method 9".
13. Condition 7.4.9.d. appears to be missing.

We look forward to working with you to address all of our comments. If you have any questions, please feel free to contact David Ogulei, of my staff, at (312) 353-0987.

Sincerely,


Genevieve Damico
Chief
Air Permits Section